

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

UNITED STATES OF AMERICA, ex rel.,
and
William L. Fry
113 Garloch Drive
Erie, PA 16505,

Plaintiffs,

v.

FIRST INVESTMENT COMPANY OF
COLUMBUS, OHIO,

Defendant.

)
) CIVIL ACTION NO: 1:04-CV-00316
)
) JUDGE SEAN J. MCCLAUGHLIN
)
)
) **MOTION TO ADMIT PRO HAC VICE**
) **SARAH S. KEAST**
)
)
)
) Filed on Behalf of Defendants:
)
) **FIRST INVESTMENT COMPANY OF**
) **COLUMBUS, OHIO and EVERHOME**
) **MORTGAGE COMPANY, formerly**
) **ALLIANCE MORTGAGE COMPANY OF**
) **JACKSONVILLE, FLORIDA**
)
) Counsel of record for party:
) JENNIFER E. WATSON
) PA I.D. #78664
)
) WILBRAHAM, LAWLER & BUBA
) 603 Stanwix Street
) Two Gateway Center, 17 North
) Pittsburgh, PA 15222
) (412) 255-0500

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

UNITED STATES OF AMERICA, <u>ex rel.</u> ,)	
and)	CIVIL ACTION NO: 1:04-CV-00316
William L. Fry)	
113 Garloch Drive)	JUDGE SEAN J. MCLAUGHLIN
Erie, PA 16505,)	
)	
)	
Plaintiffs,)	
)	
)	
v.)	
)	
)	
FIRST INVESTMENT COMPANY OF)	
COLUMBUS, OHIO,)	
)	
)	
Defendant.)	

MOTION TO ADMIT PRO HAC VICE SARAH S. KEAST

AND NOW, comes Defendants, First Investment Company of Columbus, Ohio, an Ohio Corporation, and Everhome Mortgage Company, formerly Alliance Mortgage Company of Jacksonville, Florida, a Florida Corporation, by and through its counsel, Jennifer E. Watson, Esq. and Wilbraham Lawler & Buba, and hereby request this Honorable Court admit Sarah S. Keast, *pro hac vice*, and in support thereof state as follows:

1. Jennifer E. Watson and Wilbraham Lawler & Buba have been retained by Defendants, First Investment Company of Columbus, Ohio, an Ohio Corporation, and Everhome Mortgage Company, formerly Alliance Mortgage Company of Jacksonville, Florida, a Florida Corporation, for matters regarding representation in connection with the above-captioned case.

2. Local counsel for Defendants, First Investment Company of Columbus, Ohio, an Ohio Corporation, and Everhome Mortgage Company, formerly Alliance Mortgage Company of Jacksonville, Florida, a Florida Corporation, is Jennifer E. Watson.

3. Jennifer E. Watson is a member in good standing with the bar of the Supreme Court of Pennsylvania and is admitted to practice before the United States District Court for the Western District of Pennsylvania.

4. Jennifer E. Watson has been a member of good standing and has been admitted to practice before the United States District Court for the Western District of Pennsylvania since 1996.

5. Sarah S. Keast, an attorney from Goodwin | Procter LLP, 901 New York Ave., NW Washington, DC 20001 has also been retained by Defendants, First Investment Company of Columbus, Ohio, an Ohio Corporation, and Everhome Mortgage Company, formerly Alliance Mortgage Company of Jacksonville, Florida, a Florida Corporation, for matters regarding representation in connection with the above-captioned case.

6. Sarah S. Keast verifies that she is a member of good standing of the following bars:

- A. The State of Michigan
- B. District of Columbia
- C. United States District Court for the District of Columbia

7. Sarah S. Keast has not been denied admission or been disciplined by this Court or by any other Court.

8. Defendants, First Investment Company of Columbus, Ohio, an Ohio Corporation, and Everhome Mortgage Company, formerly Alliance Mortgage Company of Jacksonville, Florida, a Florida Corporation, seeks admission of Sarah S. Keast for the limited purposes of representing Defendants, First Investment Company of Columbus, Ohio, an Ohio Corporation, and Everhome Mortgage Company, formerly Alliance Mortgage Company of Jacksonville, Florida, a Florida Corporation, in the above-captioned matter currently pending in the United States District Court for the Western District of Pennsylvania.

9. Sarah S. Keast understands that if admitted *pro hac vice* in this matter, she will be required to abide by the rules governing the United States District Court for the Western District of Pennsylvania, required to notify this Court of any matter affecting her standing in the bar of any other Court, and, consistent with Local Rule 83.3.1 (D), subject to the disciplinary jurisdiction of this Court.

10. All notices and pleadings filed by Defendants, First Investment Company of Columbus, Ohio, an Ohio Corporation, and Everhome Mortgage Company, formerly Alliance Mortgage Company of Jacksonville, Florida, a Florida Corporation, will be signed by Jennifer E. Watson, as attorney of record.

11. In addition, the fee for admission *pro hac vice* will be paid contemporaneous with the filing of this Motion.

WHEREFORE, Defendants, First Investment Company of Columbus, Ohio, an Ohio Corporation, and Everhome Mortgage Company, formerly Alliance Mortgage Company of Jacksonville, Florida, a Florida Corporation, respectfully request that this Honorable Court grant this Motion to admit Defendants' counsel, Sarah S. Keast, *pro hac vice*.

Respectfully submitted,

/s/ Jennifer E. Watson
Jennifer E. Watson, Esquire
PA I.D. #78664
WILBRAHAM, LAWLER & BUBA
603 Stanwix Street
Two Gateway Center, 17 North
Pittsburgh, PA 15222
(412) 255-0500

Counsel for Defendants:
**First Investment Company of Columbus,
Ohio and Everhome Mortgage Company,
formerly Alliance Mortgage Company of
Jacksonville, Florida, a Florida
Corporation,**

CERTIFICATE OF SERVICE

I hereby certify that I served a true and correct copy of the within **MOTION TO ADMIT PRO HAC VICE SARAH S. KEAST** upon:

Malcolm L. Pollard, Esquire
4845 Westlake Road #119
Erie, PA 16505

on this 26th day of January 2007.

/s/ Jennifer E. Watson

Jennifer E. Watson